## KEEGAN WERLIN LLP

ATTORNEYS AT LAW
265 FRANKLIN STREET
BOSTON, MASSACHUSETTS 02110-3113

TELECOPIERS: (617) 951-1354 (617) 951-0586

(617) 951-1400

March 8, 2006

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2<sup>nd</sup> Floor
Boston, MA 02110

Re: Arrearage Management Programs, D.T.E. 05-86

Dear Ms. Cottrell:

I am writing on behalf of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company d/b/a NSTAR Electric and NSTAR Gas Company (together, "NSTAR" or the "Company") to request an extension of the March 8, 2006 deadline for filing revised Residential Assistance Adjustment Clause ("RAAC") tariffs as set by the Department of Telecommunications and Energy (the "Department") in its February 28, 2006 order in this proceeding. In the order, the Department directed each gas and electric company to file revised residential assistance adjustment tariffs that include as a recoverable cost the cost of each company's approved arrearage management program. Arrearage Management Programs, D.T.E. 05-86, at 15. As discussed herein, the Company is seeking an extension of time to comply with this directive in order to allow it to file one set of revised RAAC tariffs in the near future that will incorporate additional revisions, as directed by the Department.

On December 30, 2005, the Department approved the Company's rate settlement (the "Settlement") in D.T.E. 05-85. The Settlement allows the Company to file new distribution rates for the NSTAR Electric companies by May 1, 2006 (Settlement at § 2.3). The Department's order acknowledged this future filing and directed the Company to remove its low-income discount costs from base rates and, instead, to recover them through the NSTAR Electric RAAC tariffs. NSTAR Electric/NSTAR Gas, D.T.E. 05-85, at 32.

The Department's February 28, 2006 order in this proceeding also directed each gas and electric company to file an arrearage management program that complies with the Department's directives in the order. D.T.E. 05-86, at 15. On December 30, 2005, the Department approved NSTAR's Arrearage Forgiveness Program ("AFP") in the context of approving the Company's Settlement Agreement in its D.T.E. 05-85 order, including cost recovery relating to the Program. The Company re-filed its AFP in this docket, also on December 30, 2005. The Department's D.T.E. 05-86 order did not require the Company to make any changes to the program. Accordingly, the Company's AFP, as filed in this docket on December 30, 2005, represents the Company's filing in compliance with the Department's February 28, 2006 order.

Arrearage Management Programs, D.T.E. 05-86 March 8, 2006 Page 2 of 2

The Company intends to meet the terms of the Settlement by filing new distribution rates for the NSTAR Electric companies within the next several weeks, for effect May 1, 2006, including new RAAC tariffs consistent with the D.T.E. 05-85 order.<sup>2</sup> Accordingly, the Company wishes to make one filing at that time of revised NSTAR RAAC tariffs, including a revised RAAC tariff for NSTAR Gas, that incorporate the Department's D.T.E. 05-85 and D.T.E. 05-86 directives. Therefore, the Company seeks an extension until May 1, 2006 to file RAAC tariffs for NSTAR Electric and NSTAR Gas in compliance with the Department's D.T.E. 05-86 order.

Please contact me or Kerry Britland if you have any questions regarding the filing. Thank you for your consideration.

John K. Habib

cc:

Elizabeth Cellucci

Service List, D.T.E. 05-86

The Company intends to file NSTAR Electric RAAC tariffs in the context of its upcoming distribution rate filing in order to incorporate into the RAAC tariffs new language reflecting their applicability to all lowincome discount costs and to reflect in the residential assistance adjustment factor appropriate variables to reflect the collection of all discount rate costs through the RAAC.